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9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF CALIFORNIA
11 SACRAMENTO DIVISION

13 **KAREEM J. HOWELL,**

2:22-cv-00842-WBS-SCR P

14 Plaintiff,

15 v.

16 **J. MOKTAR, F. TROJA, K. CHILDS, S.
FLOOD, S. WILLIAMSON and J.
JOHNSON.,**

**JOINT STIPULATION TO CONTINUE
THE MOTION TO COMPEL
DEADLINE; [PROPOSED] ORDER
THEREON**

17 Defendants.

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21 **TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE
22 EASTERN DISTRICT OF CALIFORNIA:**

23 **IT IS HEREBY STIPULATED** by and between the Plaintiff KAREEM J. HOWELL and
24 Defendants J. MOKHTAR, F. TROJA, K. CHILDS, S. FLOOD, S. WILLIAMSON, and J.
25 JOHNSON (Defendants) (hereafter collectively the “Parties”) that Defendants are granted **sixteen**
26 **(16) additional days** to file a motion to compel further discovery responses.

1 Plaintiff testified on August 21, 2024, that he had additional records responsive to the
2 discovery propounded by Defendants and would remit them to counsel for Defendants. However,
3 he does not know when he can remit the records as the property officer at Kern Valley State
4 Manager has custody of these records. As such, Plaintiff testified and agreed to extend
5 Defendants' time to file a motion to compel.

6 The Discovery and Scheduling Order sets forth that “[a]ny motions necessary to compel
7 discovery shall be filed by August 28, 2024.” (ECF No. 51 at 6.) However, Defendants' motion
8 to compel Plaintiff's further responses will be due on or before September 13, 2024, instead of
9 the present deadline of August 28, 2024.

10 Dated: August 23, 2024

Respectfully submitted,

11 KAREEM J. HOWELL
12 Plaintiff *Pro Se*

13 /s/ Kareem J. Howell
14 (as authorized on August 23, 2024 via
15 telephone conference)

16 KAREEM J. HOWELL
17 Plaintiff
In Pro Per

18 Dated: August 23, 2024

Respectfully submitted,

19 ROB BONTA
20 Attorney General of California
CHAD A. STEGEMAN
21 Supervising Deputy Attorney General

22 /s/ Norma Morales
23 NORMA MORALES
Deputy Attorney General
Attorneys for Defendants
K. Childs, J. Johnson, S. Williamson,
F. Troja, and J. Mokhtar

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1 **[PROPOSED] ORDER**

2 **IT IS HEREBY ORDERED** that Defendants are granted sixteen (16) days to file a
3 motion to compel further responses from Plaintiff. Defendants' motion to compel Plaintiff's
4 further responses will be due on or before September 13, 2024.

5 **IT IS SO ORDERED.**

6 DATED: September 6, 2024



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8 SEAN C. RIORDAN
9 UNITED STATES MAGISTRATE JUDGE

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